

Good Afternoon

Thank You for providing this opportunity to express our thoughts/ I'm Marilyn Althoff and I am the CEO for Hills & Dales in Dubuque . WE serve and support 170 individuals with Intellectual disabilities . Our clients are young children adolescents and young adults who have multiple challenges. Medically , physically and behaviorally. We have a ICF/ID center and we provide waiver programs in the community and in persons home from 1 hours a day to 24hours , WE also offer a inclusive licensed Childcare and Autism ABA therapies.

My interest in this process is specific to the LTSS offered through our agency and the families and individuals life impact in this systems transition process.

We recognize the states option to move to a Managed Care system of care however the population that will have the most significant impact are also the most vulnerable and who rely on multiple [pieces of this complex structure called Medicaid. They are the ones who are at most risk of :not just falling through the cracks but having their health and safety and overall well being compromised to a point where years of moving toward more independence could move them backwards towards institutional living. Until just last Friday none of the persons we support had a primary physician , hospital , pharmacy or durable medical goods provider in their Dubuque area.

It is alarming that being 2weeks out from implementation we are still trying to explain what services we do , where and how to the MCO reps. The various MCO representatives have a sincere interest but when we get beyond the one contact person the answers to questions become vague and or ambiguous or generalized that leads to frustration for everyone. This is a symptom of attempting to address readiness for show vs really knowing and understanding the questions being asked or addressing inquiries made. We have endured numerous calls and being told that our rate would be reduced by 10 percent if we didn't get the contract signed . please don't let this become an unchecked quota process that would be unfortunate.

WE have participated in all of the training the webinar and public meetings that have been held and we continue to have questions unanswered , dropped phone calls missing information regarding our agency in the MCO provider list. and persons we serve being told that Hills & Dale s is part of a specific MCO when we haven't signed a contract.. Hills & Dales has been trying to get an answer regarding clarification to the MCO s on the Enteral feeding supplies and wheel chairs being direct bill costs vs being a per diem cost in the ICF/ID . This is a very simple clarification statement request to IME due to the MCO manual being incorrect. The MCO identified that they did not understand the service that way, this is a significant cost to HD at approximately 600,000 and I made numerous attempts to have this addressed for over 1month . This has delayed our ability to sign any contract for 30days this isn't typical for IME/DHS however I sense that people are stretched because of a deadline .

Hills & Dales has a long history f good partnerships with IME , and DHS and I recognize that no one in these agencies is attempting to give misinformation or misdirect. However because the LTSS service system is comprehensive and complex we are having these issues happen. Rushing to address all of the elements of the service can cause unnecessary problems.

This transition process has been confusing for LTSS providers to say the least specifically IME/DHS did not follow information that was provided early on in implementation. Rates are not the same as what was shared and the Managed Care organizations do not have the information they needed to understand the LTSS process for rate setting, leaving LTSS providers with rates that have been reduced and based on a flawed process/ Waiver Transportation rates have not been provided to the MCOs and again there is confusion on the Non Emergency Medical and Waiver transportation. for our clients As an example a MCO didn't know what I meant by our Waiver Transportation rate and how we provided transportation to clients.

The continuous and on-going presentation that LTSS providers have been given 2 years to transition is in my opinion not accurate we must prepare for new rates and rate setting systems ,new billing systems , new case Mt systems new authorization and eligibility systems and additional new Contract requirements and policy and procedure manual compliance many of which are based on a medical model service delivery this is all multiplied by 4 .along with the new administrative rules being noticed emergency. All effective Jan 1.

. Once families can begin to have their or their loved ones medical needs challenges worked out and or solved we can begin to look at their living needs their NON (sick) services their quality of life their health and safety their work opportunities. The LTSS provider is typically funded almost exclusively by Medicaid , we don't have any other private or alternative funding /revenue sources in place to offset the challenges to transition. The resource allocation is tremendous and the strain on people attempting to learn an entire new model of business without any trails or testing of billing/payment etc. ultimately will affect the quality of the LTSS delivery up to an including continuity of care.

The current system of payment is in place and it works , IME has the LTSS rates and rate setting methodology in place . The Case Managers and the interdisciplinary systems of support can function because the framework of the structure is present , Case MT. supervision can occur with the ISIS dashboard

These are just a few of the examples and experiences we have had at Hills & Dales and again while we understand the states right to oversee and administer the Medicaid system we support delay of the Jan 1 timeline for LTSS and the vulnerable citizens and their families who along with providers will be impacted by a system that is not prepared with trialed and tested systems during a transition that affects 560,000 lowans their families and 100s od thousands of employees and support staff to make it all work effectively and efficiently